

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. No. 99-271

COMMENTS BY AT&T COMMUNICATIONS OF NEW ENGLAND, INC.,
REGARDING KPMG'S EXCEPTION NO. 9

KPMG Exception No. 9: KPMG observed that Bell Atlantic's (BA) approach to calculating metrics has created misleading performance results and that such an approach is inconsistent with the February 28, 2000 New York Carrier-to-Carrier Guidelines. KPMG observed these discrepancies in the calculation of PO-3-02 Contact Center Availability (Issue 9.1); PO-2 OSS Interface Availability (Issue 9.2); PO-3 Contact Center Availability (Issue 9.3) and PR-6 Installation Quality (Issue 9.4).

Domain: Performance Metrics Reporting

KPMG Assessment: KPMG has concluded that "if Bell Atlantic's metric creation practice does not comply with the February 28, 2000 New York Carrier-to-Carrier Guidelines the reported performance does not reflect actual operation being measured."

Date of Exception: May 9, 2000

Date of BA Response: May 17, 2000

Date of AT&T Comments: June 2, 2000

AT&T Comments:

AT&T's position has been and continues to be that appropriate performance metrics must include means for verifying the data. AT&T has proposed in past filings on performance measures in MA that a major objective of BA's performance plan should be accurate measurement of BA's conduct. To achieve this objective there must be adequate auditing mechanisms in place. Moreover, AT&T has noted that the FCC made clear that an ILEC's performance measurement plan must be subject to appropriate auditing procedures so that parties can rely with confidence on the data being reported. What KPMG has observed in this exception supports AT&T's position that the BA's performance measures data need to be monitored until such time

that there is confidence in the manner in which data is being gathered and until such time that there is confidence in the methodology being used to calculate the reported data.¹

KPMG's experience in this exception is reflective of issues that AT&T has raised in the past where Bell Atlantic deliberately or inadvertently has excluded certain critical elements from its calculation of measurements. For example, in the early part of 1999, BA was ordered by the NY Public Service Commission (PSC) to capture certain elements when calculating order confirmation timeliness. In August of 1999, after two interim orders mandating that BA include these elements and six monthly performance reports, BA stated that the issue would be resolved by March 2000. Yet another example relates to the rejection notices measure and what was included in these calculations. The NY PSC, once again, directed BA to include critical elements in its calculation of a measure. The PSC directed BA to include requests and supplements when measuring reject timeliness. This directive was provided to BA in the early part of 1999. In August of that year BA had not yet made a single change. A similar scenario existed for the calculation of the completion notices measure. Then in January and February of 2000, the local services market in NY felt the effects of miscalculations and BA was forced to re-run data that now would capture key factors needed for the measures.

If BA's data for MA is not replicated on a continuous basis, incidents such as KPMG has reported here may soon become the norm rather than the exception. Continuous monitoring or CLEC problems that lead to an investigation may be the only way to ensure that the measures are accurate and reliable. In NY, the probability of an issue such as this is minimized through the use of the standing "replication team" that monitors BA's data. In MA, KPMG has uncovered the issue through its replication of data. Going forward, in the absence of a replication team, CLECs in MA will have to raise the issue as they experience problems.

AT&T comments on selected sub-issues are as follows:

Issue 9.1

KPMG observed that BA was excluding in the denominator of the metric for "% of calls answered within thirty seconds" the "15% of abandoned calls plus 10% of busy calls" required under the NY Carrier-to-Carrier guidelines. AT&T has not seen this specific example because BA has not provided AT&T with raw data or what is known as "flat files" for data replication in the Pre-Order domain. A CLEC will only know

¹ In its filing on Performance Measures, AT&T has noted the issues with the arbitrariness of BA's compliance with the Carrier-to-Carrier methodology. *See, Initial Comments of AT&T Regarding Performance Metrics and Self-Executing Remedies*, filed on 11/30/99, pp. 34-37.

that there is an issue when there are customer-affecting problems and such problems lead to an investigation.

BA acknowledged that the two identified elements are missing and that it has taken corrective action on one and will take corrective action on the other. For one, BA states that the TISOC has instituted an immediate correction and for the other BA states that it is working with the ACD vendor to correctly capture the “busies”. KPMG should not rely on these promises alone given BA’s record on complying with similar directives in NY in 1999.

AT&T recommends that KPMG hold open this issue until BA provides (i) further detail on specifically what it has done to capture the abandoned calls and the busies in MA; (ii) how it will recalculate the measure to now include these two elements; and (iii) demonstrated evidence as to how the re-calculated measure will appear in its corrected monthly reports.

Issue 9.2

KPMG observed that BA excluded the metrics captured by Enview from its OSS Interface Availability measure. AT&T has had no demonstration of this issue but find it suspect that the Enview data is missing. Nonetheless, AT&T holds no confidence in the Enview data, in that AT&T feels it does not accurately capture the CLECs experience when BA’s OSS interface is unavailable. **AT&T would like to bring to KPMG’s attention that discussions are underway in the NY Carrier Working Group relative to the usefulness and continued use of Enview to measure OSS interface availability.** This may have accounted for BA’s exclusion of the Enview files from this measurement.